Before the

FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

MB Docket No. 19-156
Facility ID No. 72815 File No: BR-20120709ACP
Facility ID No. 90598 File No. BR-20120709AC0
Facility ID No. 72391 File No. BR-20120921AAW
Facility ID No. 5281 File No. BR-20120921ABA
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Facility ID No. 72815 File No: BAL-20160919ADH
Facility ID No. 90598 File No. BAL-20160919ADI
) Facility ID No. 72391) File No. BAL-20160919ADJ
Facility ID No. 5281 File No. BAL-0160919ADK
))
Facility ID No. 200438 File Nos. BNPFT- 20170726AEF and BNPFT- 20180314AAO

MOTION FOR EXTENSION OF TIME

Applicant, Entertainment Media Trust, Dennis J. Watkins, Trustee ("EMT"), by

and through counsel, hereby requests pursuant to 47 CFR §1.205, an extension of time to respond to the Request for Admissions propounded by the Enforcement Bureau in this proceeding under certificate of service dated July 16, 2019 and as grounds therefore would state:

- 1. There are 248 requested admissions propounded by the Enforcement Bureau covering matters over a thirteen (13) year period from 2006 to the present and which require, inter alia, consultation with multiple individuals as well as investigation of documents throughout that 13 year period in order to be able to adequately respond to the 248 requested admissions.
- 2. Pursuant to 47 CFR §1.246, the response date to the Request for Admissions is July 26, 2019.
- 3. EMT requires an additional five (5) days, to wit, July 31, 2019, to gather the information necessary to provide a complete response to the Enforcement Bureau's Two Hundred Forty-Eight (248) requested admissions. EMT has conferred with the Enforcement Bureau and with counsel for Petitioner Kern and represents that neither object to this proposed extension period.
- 4. This request is not made for the purpose of delay but merely to address the necessities imposed by the overwhelming breadth and length of the 248 requested admissions.

WHEREFORE, for the foregoing reasons, EMT requests an extension of time to respond to the Enforcement Bureau's Requests for Admissions propounded under certificate of service dated July 16, 2019 for the reasons aforesaid.

RESPECTFULLY SUBMITTED,

/s/
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CERTIFICATE OF SERVICE

I, Seth Williams, hereby certify that on this <u>22nd</u> day of July, 2019, a copy of the foregoing Motion for Extension of Time was served by email on the following:

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Courtesy copies of the foregoing were also provided by email to the following:

The Honorable Jane Hinkley-Halprin Office of Administrative Law Judges Federal Communications Commission 445 12th Street SW Washington, DC 20554 Jane.Halprin@fcc.gov

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/s/ Seth L. Williams
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